RECEIVED EISO00518

| 2 | NOV 16 1999 MS. POGUE: My name is Stacey Pogue. I'm |
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| 3 | with the Colorado Public Interest Research Group. We |
| 4 | are a state-based consumer and environmental watchdog |
| 5 | group with over 12,000 members statewide. |
| 6 | I'm going to read my testimony. Nuclear |
| 7 | waste is the deadliest substance known to humans. A |
| 8 | few seconds' exposure to an irradiated fuel rod can |
| 9 | cause cancer, and a few minutes can cause death. |
| 10 | Common sense dictates we treat this |
| 11 | material with utmost caution to protect people. Any |
| 12 | decision regarding radioactive waste must be based on |
| 13 | sound science and protecting the public. |
| 14 | Instead, nuclear waste policy in this |
| 15 | country has been driven by the arrogance and greed of |
| 16 | the nuclear industries and reckless legislation |
| 17 | promoted by industrial outlets. |
| 18 | Political expediencies have replaced |
| 19 | responsible stewardship and sound science, and decision |
| 20 | making is thrown out the window of the nuclear |
| 21 | industry. |
| 22 | COPIRG is disappointed the Department of |
| 23 | Energy has chosen to continue the trend as evidenced by |
| 24 25 | its refusal to follow its own guidelines, and disqualify Yucca Mountain, while simultaneously seeking |

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| 1 | 1 | to weaken the guidelines in this draft EIS. |
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| continued | 2 | The draft EIS is an expensive rubber stamp |
| 2 | 3 | for the Yucca Mountain waste dump. This is not the |
| | 4 | careful, conservative analysis of safety and |
| | 5 | environmental issues required by public agencies. |
| | 6 | We believe the premise of the draft EIS is fraught with |
| | 7 | the concept of building a nuclear storage facility. |
| | 8 | This draft EIS is premature since it does not analyze |
| | 9 | actual design. |
| 1 | LO | Only two other options are examined in |
| 2 | L1 | this draft EIS, and they are both unrealistic, and |
| - | L2 | therefore can't provide reasonable comparisons. |
| - | L3 | COPIRG also believes the EIS downplays |
| <u>.</u> | L4 | important and relative relevant scientific data. In |
| - | 15 | its rush to win approval of the Yucca Mountain dump, |
| - | 16 | DOE downplays or ignores important data about rainwater |
| | 17 | and groundwater in contaminant transport. For example, |
| - | 18 | the DOE claims the data on chlorine 36 are incomplete, |
| - | 19 | yet a study on this issue was published in September |
| 2 | 20 | 1997. |
| 2 | 21 | In addition, we feel the draft EIS does |
| 2 | 22 | not analyze specific transport routes. It does not |
| 2 | 23 | consider actual or likely transport routes, which means |
| | 24 | they draw broad conclusions about overall health |
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| 4 | 1 | minority communities with no actual data for |
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| ontinued | 2 | comparisons. |
| 5 | 3 | The transport accident analysis is |
| | 4 | unclear. It is impossible to assess the draft EIS |
| | 5 | basis for impacts of transportation accidents based on |
| | 6 | the vague descriptions in the report and appendices. |
| 7 | 7 | In addition, there's concern about the |
| | 8 | transport of the waste through Colorado to Yucca |
| | 9 | Mountain considering that the information I got there's |
| | 10 | over 2,000 casks of radioactive waste will be shipped |
| | 11 | through the state. The draft EIS does not adequately |
| | 12 | address the transportation routes and the hazards in |
| | 13 | possible accidents. |
| | 14 | In conclusion, the DOE currently spends |
| | 15 | billions of dollars every year in an effort to protect |
| | 16 | the public from radioactive waste dumps as a result of |
| | 17 | weapons production. The technical difficulties are |
| | 18 | nearly insurmountable. In some places millions of |
| | 19 | dollars are spent merely monitoring the spread of |
| | 20 | radiation. |
| 6 | 21 | With 95 percent of the radioactivity |
| | 22 | coming from commercial waste, the DOE should reject the |
| | 23 | Yucca Mountain site, and work to develop nuclear waste |
| | 24 25 | solutions based on sound science and protecting the public health instead of nuclear industry's profits. |